

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,)
)
)
Plaintiff,)
)
 Case No.: 09-3018-CV-S-RED
vs.)
)
 Jury Trial Demanded
TEXAS COUNTY, MISSOURI;)
MICHAEL R. ANDERSON,)
TEXAS COUNTY PROSECUTING)
ATTORNEY; and)
MICHAEL R. ANDERSON, individually)
)
Defendants.)

PROPOSED VOIR DIRE QUESTIONS

1. The Plaintiff in this case is Monica Daniel Hutchison from Cuba, Missouri. She previously lived in Texas County and went by Monica Daniel prior to her marriage. Do any of you know Monica Daniel Hutchison, her husband Nick Hutchison, or any members of her family?
2. Monica Daniel Hutchison is represented by David L. Steelman and Stephen F. Gaunt of the Law firm of Steelman, Gaunt & Horsefield in Rolla, Missouri. Do any of you know Mr. Steelman or Mr. Gaunt or any other member of that law firm?
3. Are any of you related by either blood or marriage to any member of the law firm of Steelman, Gaunt & Horsefield?
4. Do any of you know any of Mr. Steelman's family, Mr. Gaunt's family or any other family of the Law Firm of Steelman, Gaunt & Horsefield?
5. Have any of you had any contact, social or otherwise (such as business dealings), with anyone of the firm of Steelman, Gaunt & Horsefield or members of their family?
6. The Defendant in this case is Michael R. Anderson of Houston, Missouri. Do any of you know Mr. Anderson, or any members of his family?
7. Have any of you had any contacts, social or otherwise (such as business dealings) with Michael R. Anderson or anyone at the Texas County Prosecuting Attorney's Office or with any law enforcement in Texas County, Missouri?
 - a. This includes the Texas County Sheriff's office.

- b. This includes the Highway Patrol in Texas County, Missouri.
 - c. This includes the City of Licking, State of Missouri, which is located within Texas County.
- 8. Do any of you have any friends or relatives associated with law enforcement, either the highway patrol, within the State of Missouri, any Sheriff's Department or any other branch of law enforcement?
- 9. Michael R. Anderson is represented in the case by Warren Harris and Lance Roskens of the Law Firm of Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP. Do any of you know Mr. Harris or Mr. Roskens, or any members of the Law Firm of Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP?
- 10. Are any of you related by either blood or marriage to any member of the law firm of Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP?
- 11. Do any of you know any of Mr. Harris' family, Mr. Roskens' family or any other family of the Law Firm of Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP?
- 12. Have any of you had any contact, social or otherwise (such as business dealings), with anyone of the firm of Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP or members of their family?
- 13. Do any of you adjust personal injury or damage claims for a living?
- 14. Do any of you have any friends or relatives that adjust personal injury claims or damages?
- 15. Do any of you have feelings about lawsuits or people who bring lawsuits and ask for money damages?
- 16. Do any of you have feelings about the lawyers who represent people bringing a lawsuit for money damages?
- 17. Have any of you had any experience in law enforcement?
- 18. Do any of you have any friends or family with experience in law enforcement?
- 19. Have any of you ever been accused of job discrimination?
- 20. Have any of you or your family ever filed a lawsuit alleging defamation, slander or liable?

21. Have you or has any member of your family ever seen a psychologist, psychiatrist, a licensed professional counselor or other mental health professional?
22. Have you or has any member of your family ever been retaliated against by an employer or a supervisor for speaking out on a job?
23. Have you or any member of your family ever been falsely accused of treating a subordinate unfairly?
24. Has a subordinate or co-worker ever complained to you that he or she was treated unfairly when in reality they were just performing poorly?
25. Do you believe that it is too hard to fire people from their jobs?
26. Have any of you or have any members of your family been embarrassed by having matters you thought were private be publically exposed?
27. There will be evidence in this case of sexual activity of Plaintiff. Is there any reason that you are aware that you should not listen to a case where sexual activity is in evidence?
28. Are any of you or is any member of your family an attorney?
29. There will be evidence in this case that the Plaintiff had affairs with two married law enforcement. Does that evidence bias you against the Plaintiff?
30. How many of you are married?
31. How many of you are single?
32. Are you presently employed outside the home?
 - a. Please describe your employment.
 - b. Do you supervise employees?
33. Is your spouse presently employed outside the home?
 - a. Please describe the employment
 - b. Is your spouse a supervisor of employees or employer?
34. Do you have an opinion as to whether people who claim job discrimination are telling the truth or lying?
35. What training have you received in the area of job discrimination or sexual harassment?

36. What are your feelings about people who come into court asking for money damages for job discrimination?

37. What are your feelings about people who come into court asking for money damages because of a lawsuit filed against them?

38. Do you believe that a Plaintiff who files a lawsuit that is determined to be without merit should be liable for damages?

39. What are your feelings about punitive damages?

- a. If the evidence justifies it will you feel comfortable awarding a verdict, which will send a message to Michael Anderson and others similarly situated?
- b. If the evidence justifies it will you be able to award a seven figure punitive damage verdict?

40. Have any of you been involved as a party or witness in a lawsuit?

- a. What kind of case?
- b. Was the case tried or settled?
- c. Was the result satisfactory to you?
- d. Were you the Plaintiff, Defendant or Witness in the lawsuit?
- e. Do you have any lingering feelings about the lawsuit which might affect your ability to sit in as a juror in this case?

41. Have you ever served on a jury before?

- a. What type of case?
- b. Was there any effect on you as a result of that case, which would make it difficult for you to serve as a juror in this case?

42. Do any of you know for any reason what so ever, which might cause you to favor one side or the other in this trial before you hear all the evidence or keep you from being completely impartial in considering the evidence presented to you?

43. The Plaintiff and Defendant in this case will need your full attention during this trial in deciding the issues of this case. Do any of you have any reason why you would not be able to devote your full attention to this matter in the next week?

Respectfully Submitted,

STEELMAN, GAUNT & HORSEFIELD

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, David L. Steelman, hereby certify that on the 30th day of November, 2010 the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to:

Warren E. Harris
Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP
3315 East Ridgeview, Ste. 1000
Springfield, MO 65804
Counsel for Defendant Michael Anderson

/s/ David L. Steelman
David L. Steelman